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June 15, 2010

Mr. Victor Alvarez
US Environmental Protection Agency
Industrial NPDES Permits (CIP)
1 Congress Street, Suite 1100
Boston, MA 02114-2023

Subject: Notice of Change - Treatment System Modifications Kendall Square Garage Site, Cambridge, MA RGP Authorization #MAG910117

Dear Mr. Alvarez,

On behalf of BMR-350 E Kendall F LLC ("BMR"), AECOM herein submits this Notice of Change (NOC) requesting authorization for potential modifications to the existing groundwater treatment system at the Kendall Square Garage site at 350 East Kendall Street in Cambridge, MA. This site was authorized to discharge under the Remediation General Permit (RGP) by Authorization #MAG91011 on May 22, 2006. Please find attached the NOC form with the required general site information.

TOTAL RESIDUAL CHLORINE

As indicated as a possible treatment option in the original Notice of Intent, AECOM has installed a treatment component to address Total Residual Chlorine (TRC) in the influent to the treatment system. Sodium sulfite is delivered to the system as part of normal treatment system operations at the Site. The system consists of a tank, a mixer and a metering pump. Sodium sulfite reacts instantly with free chorine to sequester it in a manner acceptable for discharge. The modification is shown in the attached figure. The addition of sodium sulfite has reduced the concentration of TRC to levels below the current discharge limitation almost instantaneously following addition of this compound.

The attached table shows the historical analytical results for the influent and effluent from the system. In addition to the sodium sulfite treatment system installed in September 2010, in February 2010 the analytical laboratory also modified the preparation step to address possible metals interference in the TRC analysis. The Hach methodology the lab uses to treat the Kendall Square Garage Site samples for metals interference includes a pH adjustment, followed by the addition of Potassium lodide and Sodium Arenit with the resulting mixture analyzed for TRC. The results from this analysis are subtracted from the original analysis to obtain the correct TRC concentration. This preparation step reduces the interference of manganese or chromium oxidized.

With the modifications to the analytical procedure and the addition of the sodium sulfite treatment step, the influent and discharge concentrations have been in continuous compliance with the discharge limitations since January 2010.

PROPOSED CARBON TREATMENT COMPONENT REMOVAL

BMR proposes to remove the carbon treatment components of the existing treatment system as indicated in the attached figure. Influent concentrations of organic compounds have been predominately below the discharge criteria as summarized in the attached Tables 1 through 3, indicating that carbon treatment is not necessary to remain in compliance with the conditions of the RGP.

Ann Herrick US Environmental Protection Agency Industrial NPDES Permits (CIP) Page 2

ENSR

Monitoring of the effluent stream would continue in accordance with the current monitoring schedule to verify that carbon treatment is not required.

Please let us know at your earliest convenience if these modifications to the system are acceptable. If you have any questions or require additional information, please do not hesitate to contact either of the undersigned at AECOM at 978-589-3000. We look forward to your response to this NOC.

Sincerely yours,

Laura A. Kelmar, P.E. Compliance Manager

laura.kelmar@aecom.com

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enc (2)

cc: S. DeLiddo, BMR

Neeraj Ghai Project Manager

neeraj.ghai@aecom.com



AECOM 2 Technology Park Dr Westford, MA 01886 978.589.3000 978.589.3282 tel fax

Tables

Table 1 - Summary of Data for Other Compounds - January 2007 through April 2010

Kendal Square Garage Site RGP Authorization # MAG910117, Issued May 22, 2006

Other Compounds

	Effluent Limit	Jan-07	Feb-07	Mar-07	Apr-07	May-07	Jun-07	Jul-07	Aug-07	Sep-07	Oct-07	Nov-07	Dec-07	Jan-08	Feb-08	Mar-08	Apr-08	May-08	Jun-08	Jul-08
Influent	-																			
Copper (ug/L)		14	8.0	5.0	ND	ND	8.0	57	16	6.0	ND	ND	19	13	ND	ND	ND	43	14	ND
Total Petroleum Hydrocarbons (mg/L)	-	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Residual Chlorine (ug/L)	-	ND	ND	ND	20	20	60	10	20	30	20	20	20	20	ND	10	10	40	20	50
pH (s.u.)	-	7.4	7.7	7.4	7.4	7.3	7.1	7.2	6.6	7.2	7.2	7:5	7.5	7.6	7.3	7.4	7.4	7.5	7.4	7.3
Effluent			Market Ma						-			The second second	LON-THE COLOR			-	110			
Copper (ug/L)	260	6	ND	ND	ND	31	12	77	7.0	5.0	ND	ND	ND	9.0	ND	ND	ND	2	10	ND
Total Petroleum Hydrocarbons (mg/L)	5.0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Residual Chlorine (ug/L)	20	SWEDEWAY.	60.4	至最50年5	27032	ND	网络0 公司	200 Tax	ND	EX 120 833	4012	ND	网络60种类	5000 St	多成長0%的	2010 to	955200 M	ND	经约00 编	230
pH (s.u.)	6.5-8.3	7.1	7.5	7.2	7.4	7.2	7.0	7.1	7.0	7.1	7.1	7.4	7.3	7.5	7.3	7.3	7.3	7.3	7.2	7.3

Notes:

ND = not detected

ns - not sampled

- = not applicable

ug/L = micrograms per liter

mg/L = milligrams per liter

s.u. = standard units

* The sampling program was modified beginning November 2008, per the Notice of Change (NOC) authorized by EPA on October 21, 2008. After the NOC, the effluent is sampled monthly for pH and Total Residual Chlorine, and quarterly for copper.
Detection
Exception of Efficient Limit.

Table 1 - Summary of Data for Other Compounds - January 2007 through April 2010

Kendal Square Garage Site RGP Authorization # MAG910117, Issued May 22, 2008

Other Compounds

II-> Reduced sampling program began Nov-08

Other Compounds				Annual Control	Il-> Medic	can equit	mig broß	tam negai	1 1404-00				_									
	Effluent Limit		Sep-08	Oct-08	Nov-08	Dec-08	Jan-09	Feb-09	Mar-09	Apr-09	May-09	Jun-09	Jul-09	Aug-09	Sep-09	Oct-09	Nov-09	Dec-09	Jan-10	Feb-10	Mar-10	Apr-10
Influent																	Langue Co.					
Copper (ug/L)		10	ND	ns.	Olins?S	Latins was	wins:	eachs.	Me ns la	amns an	sains of	5408	na w	Come and	57.03	what	44-08-W	Z.hsur	de net	ne	X ns w	and on the
Total Petroleum Hydrocarbons (mg/L)	2	ND	ND	编》:	gerins at	E Sens	22.118.12	scarns and	ns n	nsi	PEARS &	ns -	ha h	Wensel 7	ns	ns.	ns	atins .	ns ns	na x	ns	115
Residual Chlorine (ug/L)		90	70	ne ne	www.ns	A Maria	ns	** ps ***	y ns	ns.	anna .	ns.	ns	: Linswe	50	23,300	ND	ND	ND	ND	ND	ND
pH (s.u.)		7.2	7.2	THE DE THE	ns ns	7 ns 🗐	4.080	ans.	ns 😁	ins.	at inside	- ns	ns.	ns	A PRIS	na	ns	ns.se	nsew.	ens.	ns	E ens
Effluent							Lazzania eta															
Copper (ug/L)	260	ND	ND	ND	ND	- hs	uns in	ND	reigns in	, n81 n	ND	a na	4 ns	(S)	SHIST	Sens,	ND	wins 3	mins-	ND	- ns	L ins
Total Petroleum Hydrocarbons (mg/L)	5.0	ND	- ND	ND	in new	10810	n ns	WIRTH	ins	Vins.	Mins w	60 ns	ns 🔧	ns n	11870	2 18 ×	es.	ne.	W/08 2	m8	115	ns.
Residual Chlorine (ug/L)	20	24.25 Q TES	30	4050	185 W	F60	201	100	第 50条件	建设60%	图43000	30.0	原用200%	多和00度	ND	50.2	20	9870 端	ND	ND	ND	ND
pH (s.u.)	6.5-8.3	7.3	7.3	7.2	7.5	7.24	7.25	7.11	6.97	6.95	7.00	7.27	7,21	7.15	7.22	7:04	7.27	7.23	7.33	7.37	7.24	6,92

Notes:

ND = not detected

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ug/L = micrograms per liter

mg/L = milligrams per liter

s.u. = standard units

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Detection Exceedance of Effluent Cinit

Table 2 - Summary of VOC Data - January 2007 through April 2010

Kendal Square Garage Site RGP Authorization # MAG910117, Issued May 22, 2008

Volatile Organic Compounds *

Totalio organio com	Effluent																					
	Limit	Jan-07	Feb-07	Mar-07	Apr-07	May-07	Jun-07	Jul-07	Aug-07	Sep-07	Oct-07	Nov-07	Dec-07	Jan-08	Feb-08	Mar-08	Apr-08	May-08	Jun-08	Jul-08	Aug-08	Sep-08
Influent (ug/L)																						
Benzene		2.7	3.4	4.9	5.9	3.8	1.4	ND	1.2	ND	1.2	2.0	1.4	4.7	2.0	3.3	1.2	ND	ND	1.2	12	ND
Ethylbenzene		ND	ND	ND	ND.	ND	ND															
m&p-xylene	1 - 1	ND	ND	ND	ND	ND	ND .															
Toluene	- 1	ND	ND	ND	2400	ND	ND	ND	ND	ND	ND											
o-xylene	-	ND	ND	ND	GN	ND	ND															
Total BTEX	-	2.7	3,4	4.9	7.0	3.8	1.4	ND	1.2	ND	1.2	2.0	4.4	4.7	2.0	3.3	1.2	ND	ND	1.2	12	ND
Chlorodibromomethane		ND	ND	ND	ND	ND	ND															
Bromoform	-	ND	5.7	ND	ND	ND	ND															
Effluent (ug/L) **										K							A =====					
Benzene	5.0	ND	ND	ND	ND	ND	ND															
Ethylbenzene	120	ND	ND	ND	ND	ND	ND															
Toluene		ND	ND	ND	ND	ND	ND															
m&p-xylene		ND	ND	ND	ND	ND	ND															
o-xylene	1 - 1	ND	ND	ND	ND	ND	ND															
Total BTEX	100	ND	ND	ND	ND	ND	ND															
Chlorodibromomethane	monitor	ND	ND	ND	ND	ND	ND															
Bromoform	monitor	ND	ND	ND	ND	ND	ND.															

Notes:

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ns - not sampled

- = not applicable

ug/L = micrograms per liter

*The sampling program was modified beginning November 2008, per the Notice of Change (NOC) authorized by EPA on October 21, 2008. After the NOC, the effluent is sampled quarterly for benzene and semiannually for ethylbenzene, toluene and xylenes.

** Beginning Nov 2008 effluent results are from the intermediate (between

carbon units) sample

Detection

Exceedance of Efficient Limit

Table 2 - Summary of VOC Data - January 2007 through April 2010

Kendal Square Garage Site RGP Authorization # MAG910117, Issued May 22, 2006

	Effluent	Oct-08	Nov-08	Dec-08	Jan-09	Feb-09	Mar-09	Apr-09	May-09	Jun-09	Jul-09	Aug-09	Sep-09	Oct-09	Nov-09	Dec-09	Jan-10	Feb-10	Mar-10	Apr-10
Influent (ug/L)							The state of the s			North Control		main to being								
Benzene	-	ns -	frensite.	wens?	as na was	un ns	in ins	-080%	const	s. ns	ns.	sins a	in install	2000S	r ins	y ins	-hs	COSTS	a tins the	DESTINATION OF
Ethylbenzene		t ns	in its	ns	ris as	ons e	ns +	a install	i is	TIS IN	การ	ns 3	ns	ns	HCHST.	ns s	ns.	2018	Suns Mi	ris
m&p-xylene	-	in this st	Mins III	a ris	4.715-40	his.	ns	one ve	and the	machine.	- hs	ns.	en.	ins.	us ns w	ins	ens:	19.4	Consum	nsw
Toluene	-	ns in	as ns	nso	ons.	ins d	ns	ans an	TOTAL T	e ns	ns	HS (S	ns.	A 119	in name	Ins.	fis	115-5	vensive	Sorts II
o-xylene	-	ns.	of this total	na 🖈	WHITE NAME	ins.	ns-	ans	Mins 5	ins c	ns.	is neally	ns	ene	a nesta	iii ns	ns	A field	e nas	duns 1
Total BTEX	-	en name	THE PARTY	ns XIII		Mins III	ns sx	KATS AN	WHE SH	AMEN BOOK	ns.	ha Mi	ins 4	ns.	is na	ns	hs w	Stems 2	Ana A	2 2 ns/2
Chlorodibromomethane	-	e nav	15/70s/23	Ans ex	ns.	ins/f	c. Vhs	e install	Colins a	Sens III	ii ns	ns.e	surns a	Mark Television	Cons	ns:	ne fisher	install	inst,	is ins
Bromoform	-	ns	ANTHE SE	italis i	是 King	ns is	ns de	ns	ans s	第08 分	i ns	ins to	115	ns a	* ns * n	- ns	ns **	A THE	o navo	05
Effluent (ug/L) **	-		** Interme	diate		** Interme	diate		** Interme	diate		**Interm.	**Interm.	**Interm.	**Interm.	**Interm.	**Interm.	**Interm.	**Interm.	**Interm.
Benzene	5.0	ND	ND	ins.	AN OS OF	ND	ins it	A TISIN	ND	Marins	Ax HS	ND .	ND	ND	ND	ND	ND	ND	ND	ND
Ethylbenzene	200	ND	ND	A ins	withs .	w hs	ens.	tuns k	ND	ns	n ins	ns w	Sans Es	SET SET	ND	ns ns	ND	ND	ND	ND
Toluene	-	ND	ND	Fall St	T ns	38 ds	2 Hs	Stans	ND	this s	ns	ns.	ar ns se	Te en	ND	A16	ND	ND	ND	ND
m&p-xylene		ND	ND	Sales of	tions in	o ns	ide na se	Sens H	ND	c ns	ens 2	ns	E OS	S ns as	ND	ins.	ND	ND	ND	ND
o-xylene		ND	ND	va installa	erens:	ns	the had	String de	ND	Marie 1	ns'	ns s	15 8	TIS IN	ND	ici ds	ND	ND	ND	ND
Total BTEX	100	ND	ND	Alterns St	ns-	The Sol	Sins si	makini	ND	ins.	ma V	Se MS	A HIS	FINS II	ND	ns .	ND	ND	ND	ND
Chlorodibromomethane	monitor	ND	Se ns	4 ns	Waths de	เล้า กราก	2 ns	Sens Si	o inside	ns ns	DE havo	ns -	- BSW	ans.	a ns as	ans	ns :	Ans.	y interes	170.05
Bromoform	monitor	ND	Marine P.	a na sk	ne s	The same	The mask	TO WA	1200	a une	300 A 200	1000	· · · · · · · · · · · · · · · · · · ·	STATE INC	创业内容	things.	ne	DOWNSHIP	100 miles	annose.

Notes:

ND = not detected

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ug/L = micrograms per liter

* The sampling program was modified beginning November 2008, per the Notice of Change (NOC) authorized by EPA on October 21, 2008.

After the NOC, the effluent is sampled quarterly for benzene and semiannually for ethylbenzene, toluene and xylenes.

** Beginning Nov 2008 effluent results are from the intermediate (between carbon units) sample

Detection

Exceedance of Efficient Limits

Table 3 - Summary of Group II PAH Data - January 2007 through October 2008 Kendal Square Garage Site RGP Authorization # MAG910117, Issued May 22, 2006

Group II Polycyclic Aromatic Hydrocarbons **

	Effluent Limit	Jan-07	Feb-07	Mar-07	Apr-07	May-07	Jun-07	Jul-07	Aug-07	Sep-07	Oct-07	Nov-07	Dec-07	Jan-08	Feb-08	Mar-08	Apr-08	May-08	Jun-08	Jul-08	Aug-08	Sep-08	Oct-0
Influent (ug/L)			1																				
Acenaphthene	14	ND	ns																				
Acenaphthylene		ND	ns.																				
Anthracene	-	ND	ns																				
Benzo(g,h,i)perylene		ND	ns																				
Fluoranthene	-	ND) ns																				
Fluorene	-	ND	ns																				
Naphthalene		ND	. ≍ns																				
Phenanthrene		ND	กร																				
Pyrene		ND "	ND	ns																			
Total Group II PAHs		ND	ns.																				
Effluent (ug/L)													1										
Acenaphthene		ND	ND																				
Acenaphthylene		ND	ND .	ND	ND																		
Anthracene	(A)	ND	ND:	ND	ND																		
Benzo(g,h,i)perylene	181	ND	ND																				
Fluoranthene	- ×	ND	DN	ND	ND	ND	ND	ND	- ND	ND	ND	ND	ND	ND	ND	ND	ND						
Fluorene	-	ND	ND																				
Naphthalene	20	ND	ND																				
Phenanthrene		ND	ND																				
Pyrene		ND	ND																				
Total Group II PAHs	100	ND	ND																				

Notes:

ND = not detected

ns - not sampled - = not applicable

ug/L = micrograms per liter

** Sampling for Group II PAHs ended in October 2008, per the

Notice of Change authorized by

Detection Exceedance of Effluent Limit

Table 4 - Summary of Data from Semiannual Recertification of "Believed Absent" Status - November 2006 through November 2009

Kendal Square Garage Site RGP Authorization # MAG910117, Issued May 22, 2006

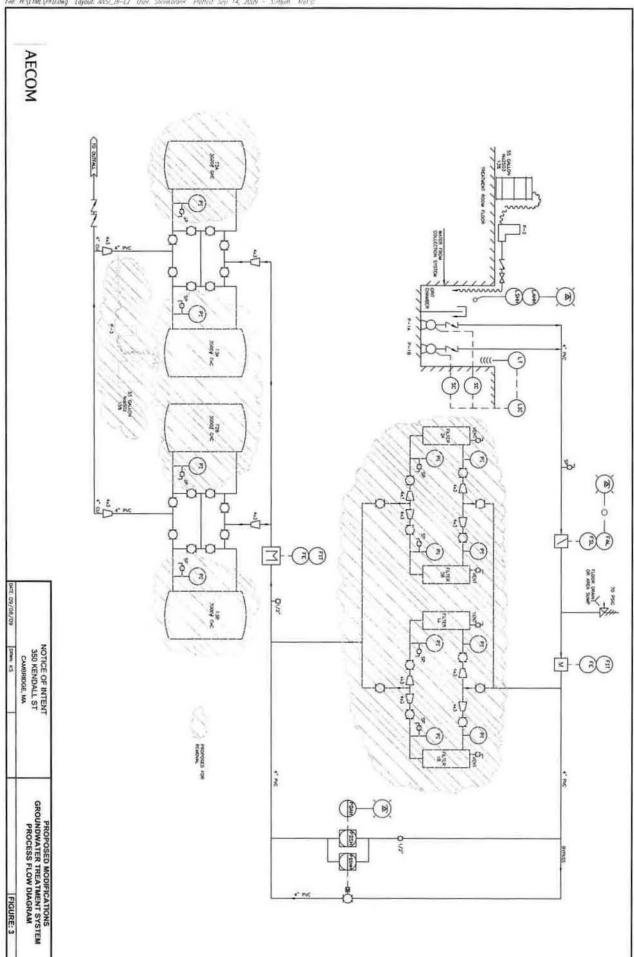
Sample Date	11/15/2006	5/17/2007	11/19/07	05/14/08	11/12/08	05/28/09	11/11/09
Sample Location	Influent	Influent	influent	Influent	Influent	Influent	Influent
Volatile Organic Compoun	ds (ug/L)						
Acetone	ND	ND	ND	ND	ND	ND	ND
Group II Polycyclic Aromat	ic Hydrocarbo	ns (ug/L)					
Benzo(a)anthracene	ND	ND	ND	ND	ND	ND	ND
Benzo(a)pyrene	ND	ND	ND	ND	ND	ND	ND
Benzo(b)fluoranthene	ND	ND	ND	ND	ND	ND	ND
Benzo(k)fluoranthene	ND	ND	ND	ND	ND	ND	ND
Chrysene	ND	ND	ND	ND	ND	ND	ND
Dibenzo(a,h)anthracene	ND	ND	ND	• ND	ND	ND	ND
Indeno(1,2,3-cd)pyrene	ND	ND	ND	ND	ND	ND	ND
Total Group II PAHs	ND	ND	ND	ND	ND	ND	ND
Metals (ug/L)							
Chromium VI (hexavalent)	ND	ND	ND	ND	ND	ND	ND
Chromium III (trivalent)	ND	ND	ND	ND	ND	ND	ND
Nickel	ND	7.0	3	ND	ND	ND	ND
Zinc	70	57	50	45	68	70	40
Iron	1040	740	890	760	983	1050	590

Notes:

ND = not detected ug/L = micrograms per liter

AECOM 4

Process Flow Diagram



AECOM 5

Notice of Change Form

B. Suggested Form for the Consolidated General Permit Notice of Change (NOC)

1. General site information. Please provide the following information about the site:

a) Name of facility/site : Kendall Square Garage (RGP Authroizati	on #MAG910117)		Facility/site address	:									
Location of facility/site: longitude: 31, 95, 10	Facility SIC code(s):	Str	eet: 350 Kendall Stre	et									
latitude: 29, 52, 42	N/A	To	wn: Cambridge		State: MA	County: Middlesex	Zip: 02142						
b) Name of facility/site owner: BMR / Rogo	ers Street LLC												
Owner is (check one): 1. Federal 2. Sta		Telephone no. of fac	ility/site owner: (85	8) 485-9840									
3. Private ✓ 4. other, if so, descri	ribe:		Fax no. of facility/sit	te owner: (858) 485	-9843								
Address of owner:			City/Town: San Die	ego									
Street: 17190 Bernado Center Drive			State: CA		Zip: 92128	County:							
c) Legal name of operator:		Operator telephone no: (978) 589-3042											
AECOM			Operator fax no.: (978) 589-3035										
Operator contact name and title: Neeraj Gh													
Address of operator (if different from owner	Street: 2 Technology Park Drive												
Town: Westford	•	State: MA Zip: 01886 County: Middlesex											

2. Type of changes:

Please check all that apply:	Eligible changes for use of NOC:
	1. Request for a reduction in monitoring requirements based on sampling and analytical data. Written approval by EPA is required.
	a) For a reduction in influent monitoring frequency, the permittee must provide 6 consecutive months of influent monitoring data.
	b) For a reduction in effluent monitoring frequency of an applicable parameter, the permittee must provide 12 consecutive months of data demonstrating compliance with the parameter limits, the minimum level (ML) (see Part I.D.1.d), or demonstrating no toxicity (where whole effluent toxicity testing (WET) is required).
	2. A change in flow conditions which may increase or decrease the daily average or maximum flow rate by more than twenty-five (25) percent, provided the design flow capacity of the treatment system is not exceeded and the dilution factor will not change to a value greater than five (5), where the discharge contains metals.
✓	3. A change in treatment which:
	a) affects the design flow of the system but does not change the dilution factor to a value greater than five (5), where the discharge contains metals.
✓	b) adds or removes any major operable unit of the system
✓	4. The use of chemical treatment additives that will not add any pollutants which may cause a violation of receiving water standards or cause the overall effluent to violate effluent limitations. Attach the material safety data sheets (MSDS) and prior approval from the Director.
	5. Change of discharge location within the same receiving water as submitted in the NOI.
	6. Temporary cessation of discharge greater than 120 days. Describe (using additional sheets as needed):
	a) reasons for the interruption or cessation of discharge:
	b) estimated time frame when the discharge will cease and be re-started:
	c) how "start-up" monitoring will resume when the discharge is re-started:
	7. Change in pH range in MA:
	8. Change to administrative information:

3. Signature requirements. The Notice of Intent must be signed by the permittee in accordance with the signatory requirements of 40 CFR Section 122.22, including the following certification:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, I certify that the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I certify that I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Facility/Site Name: Kendall Square Garage (RGP Authorization #MAG910117)

Signature of permittee(s):

Karen A. Sztraicher

Title: Sr. Vice President, Asset Management

Date: 6/16/10